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UNITED STATES DISTRICT COURT FOR THE _____ FILED _____ ENTERED
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AT SEATTLE
 CLERK U.S. DISTRICT COURT
 BY WESTERN DISTRICT OF WASHINGTON DEPUTY

Jason Everett Ross
 4525 164th st SW Apt W103
 Lynnwood, WA, 98087

Plaintiff(s)

vs.

VA Puget Sound Health Care System
 1660 South Columbian Way
 Seattle, WA, 98108

Defendant(s),

15 CV-01090 MJP
 COMPLAINT

Parties to this Complaint:

Plaintiff's Name, Address and Phone Number

Jason Everett Ross
 4525 164th st SW Apt W103
 Lynnwood, WA, 98087
 (425) 361-1820
 (702) 376-7373

Defendant's Name, Address and Phone Number

VA Puget Sound Health Care System
 1660 South Columbian Way
 Seattle, WA, 98108
 1-800-329-8387

Defendant's Name, Address and Phone Number

Doris L. Gruntmeir (Regional Counsel)
 Department Of Veterans Affairs
 Office Of Regional Counsel
 One Veterans Drive, Bldg. 73
 Minneapolis, MN, 55417

1 Defendant's Name, Address and Phone Number

2 Michael Hughes (Seattle Regional Counsel) 206-220-6102
 3 Department Of Veterans Affairs
 4 Office Of Regional Counsel
 915 Second Avenue
 Seattle, WA, 98174

5 (If you have more defendants, list them using the same outline on another piece of paper.
 6 Attach additional sheets, if necessary)

7 **Jurisdiction**

(Reason your case is being filed in federal court)

8 I filed a claim with the Veterans Administration under the Federal Tort Claims Act (FTCA), 28 U.S.C. 1346(b)
 9 and 2671-2680. The VA responded after six months and denied my claim for compensation under Medical
 10 Negligence for mis-prescription of medication that led to necrotizing pancreatitis.

11 **Statement of Claim:**

12 (State here as briefly as possible the facts of your case.)

13 My name is Jason Everett Ross, I served in the U.S. Marine Corps from 1989-1995. I am a veteran of the Persian
 14 Gulf War in 1991 and Mogadishu, Somalia in 1993. I have been receiving counseling for PTSD at the Everett Vet
 15 Center since 2009. My therapist Dr. Mark Hoagland diagnosed me with PTSD, severe depression, anxiety and
 16 panic disorders. Dr. Hoagland could not prescribe anti-depressant medications to me, so he referred me to the
 17 Mental Health Department at the VA Puget Sound Health Care System in Seattle. In Oct 2011 I called for an
 18 appt. and was assigned to Dr. Mark Hamblin. We met for our first appointment at the VA and he immediately
 19 prescribed me the anti-depressant (Paroxetine) 75mg once per day. After three months of little success, I was
 20 overcome with hopelessness, so Dr. Hamblin prescribed a different anti-depressant called (Venlafaxine) 75mg
 21 once per day. After a month he ramped it up to 75mg twice per day. I remember explicitly discussing how I
 22 was feeling, and the side affects involved with taking anti-depressants. I remember complaining about the
 23 anti-depressants hurting my stomach and making me feel nauseous for the first two hours after taking it. The
 24 anti-depressants were also causing impotency and mood disorders. Dr. Hamblins response was "make sure
 25 you are taking it at the same time everyday, and do not miss taking it." I asked him three separate times to
 26 change my prescription to something else that would not hurt my stomach or make me nauseous. But Dr.
 Hamblin insisted on trying a second medication (Bupropion) 75mg combined with the (Venlafaxine) 75mg
 twice per day. I was prescribed two strong anti-depressant medications that were both 75mg twice per day.
 The combination of Bupropion and Venlafaxine twice per day was too much for me and a month later I
 suffered a massive Pancreatitis attack during class at the University of Washington. I was vomiting and the
 pain in my stomach was excruciating and unbearable. The paramedics rushed me to the closest hospital,
 which from Bothell was Evergreen hospital in Kirkland. Shortly after arriving at the emergency room I went
 into Renal failure and was fighting for my life. I was heavily medicated with morphine and put on a breathing
 machine. My Fiance' Annie was told that it did not look like I was going to make it and she needed to get my
 family there asap and to also get my affairs in order. Needless to say she was emotional and devastated.
 After a CT scan my doctors told me the anti-depressant medications caused a giant pseudocyst that was 21cm
 by 25cm and was causing my organs to shut down. The doctors said the psuedocyst was affecting my heart,
 lungs, kidneys, liver and pancreas, and it also damaged my spleen. My doctors said I suffered a massive
 pancreatitis attack and the only thing that saved me was my age, had I been older, I would have died from it.
 After six days I was stable enough to be moved, I was then transfered to the VA Puget Sound Health Care
 System in Seattle. I was in the Intensive Care Unit (ICU) for three weeks.

Relief:

(State briefly exactly what you want the court to do for you)

I am seeking the court to grant me monetary compensation from the Veterans Administration in the amount of \$3,000,000.00 for pain and suffering, the loss of over 90% of my pancreas, the life-changing state of my current medical conditions as well as my future medical conditions. When I lost my pancreas, I lost the ability to digest my food, which now has to be artificially digested through enzyme tablets (50 per day), also I lost all of the cells that create insulin, I am not a diabetic now but my doctors say I will be in the future and will require insulin daily. I want the Veterans Administration to honor their responsibility to provide me with health care for the rest of my life and monetary compensation as well. Thank you.

Jury Demand:
(Optional)

July 6, 2015
Date

Jason Everett Ross
Signature of Plaintiff

